



## Catford Town Centre Local Plan Proposed Submission Consultation Form

### Introduction

Your representation should attempt to cover briefly all the evidence and supporting information to justify the representation and any suggested changes.

Following this stage of consultation it should be noted that new submissions will only be at the request of the Inspector based on the matters and issues he/she identifies for examination.

Explanatory notes on legal compliance and soundness are in the list of supporting document attached to this consultation event.

### 1. Legal Compliance

Do you consider the Catford Town Centre Local Plan Proposed Submission Document is legally compliant? (please indicate one answer)

Yes                      ~~No~~

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### Soundness

Do you consider the Catford Town Centre Local Plan Proposed Submission Document is sound? (please indicate one answer)

Yes                      ~~No~~

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### 2. Reasons for Unsoundness

**If you answered No to Q. 2 please also answer this question. Otherwise proceed straight to Q.4. Please indicate below the reasons(s) why you consider the Catford Town Centre Local Plan Proposed Submission document is unsound**

(please indicate all that apply)

~~The document is not properly prepared~~

~~The document is not justified~~

~~The document is not effective~~

~~The document is not consistent with national policy~~

### **3. Details of legal non-compliance or unsoundness**

Please give details below as to why you consider the document is not legally compliant or is unsound. If you wish to support the document please give reasons.

N/A

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### **4. Changes required to achieve legal compliance/soundness**

Please set out the changes you consider necessary to achieve legal compliance or soundness and give your reasons and any suggested re-wording.

N/A

### **5. Participation in the Oral Examination**

If you are seeking a change to the plan do you think it is necessary to take part in the Examination in Public (please indicate one answer)

**Yes**

**No**

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### **6. Reasons for taking part in the Examination in Public (EIP)**

Please give your reasons below for wishing to take part in the EIP

N/A

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## **7. Further comments**

Please give any further comments below.

The plan should provide greater emphasis to the development of non-retail uses to ensure that comprehensive redevelopment of the centre is deliverable.

Please see accompanying letter of representation from Dr Malcolm Hockaday of NLP dated 04 October 2013 (Ref: 13654/MH/5634018v6).

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## **8. Please give your contact details below**

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**Please return form to Planning Policy Group**

**3<sup>rd</sup> Floor Laurence House, 1 Catford Road London SE6 4RU or by email to [planning.policy@lewisham.gov.uk](mailto:planning.policy@lewisham.gov.uk) by 5pm 4<sup>th</sup> October 2013.**

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Date 04 October 2013  
Our ref 13654/MH/5634018v6  
Your ref

Dear Sir/Madam

## Catford Local Plan

### Representations submitted on behalf of Cathedral Group Plc

We write on behalf of our client, Cathedral Group and Development Securities PLC, to submit representations to the above consultation document.

Cathedral Group welcomes the fact that the Council is committed to the securing of investment for the regeneration and improvement of Catford town centre. However, it is important that the Council (LBL) puts in place a strategy that is capable of genuinely being delivered in practice.

The intention of these representations is to provide commentary on how the Catford Local Plan could be strengthened to ensure that proposals are both deliverable and effective, thereby making the plan sound.

### General Approach

Cathedral Group is supportive of the vision and objective of the plan. However, there remain concerns as to its effectiveness as currently expressed in its strong emphasis on large scale new retail development.

It is widely accepted that there are declining opportunities for retail development as retailer's demands for new sites are falling; as a result, the role of Catford in the retail hierarchy for this area of London is such that it is unlikely to be able to attract sufficient interest from key high street retailers. Consequently, in planning for the extensive redevelopment of Catford town centre, a more suitable balance will need to be met between the quantum of retail uses sought and other recognised town centre uses. In this regard, it would be beneficial for the plan to place increased emphasis on improving the existing strengths of the centre (i.e. civic role and services destination) to further diversify the centre's offer.



The plan should thereby

a) more explicitly prioritise the development of employment, housing and entertainment uses within the centre as these uses are more likely to come forward in this location and to provide greater benefits to the area.

b) expressly recognise the need for practical early development to take place, ensuring investment and improvements to the centre to be made on sites that are capable of being developed.

Indeed, a more modest approach to sought redevelopment would be appropriate if based upon attracting viable uses to those sites that are ready for development. This approach would enable a gradual process of improvement for Catford, rather than a period of uncertainty from possible larger scale redevelopment anchored by retail requirements.

### **Retailing and mixed uses within Catford**

It has been acknowledged by the Council and through previous studies undertaken by Peter Brett Associates (PBA; 2013) and by NLP (2009) that Catford town centre has been in decline for a number of years.

The centre has a weak retail offer (especially comparison goods), suffers from poor appearance and environment and has experienced a lack of private investment. The centre also has very few key retail attractors and compares poorly in relation to competing centres and other major centres in south London. For example, Lewisham and Bromley are both within the near vicinity and significantly better venues for shopping and hold a much better market position in the retail sector.

As previously highlighted, our client welcomes the fact that LBL is preparing a plan to allow for the redevelopment of Catford town centre, including some new retail floorspace. However, we have concerns over the extent to which a plan for regeneration of the centre can be based primarily upon an improved retail offer as there are concerns relating to the deliverability of the regeneration proposals set out within the plan.

Whilst the Council's Core Strategy gives scope for a high level of new retail floorspace (up to 22,000sq m by 2026) within the town centre, the opportunities for major retail development within Catford remain comparatively limited. Retail development is in a general state of decline due to the expanding role of internet trading and to the consolidation of higher order centres, with the key high street retailers increasingly seeking business representation in fewer larger stores within more established retail centres. Given that nearby centres such as Lewisham and Bromley already have an established retail role, these locations will remain more attractive to further retail investment. We note also that there has been very little retailer interest in Catford town centre in recent years (PBA Report 2013).

On the basis of Catford's current position in the retail market and current retail trends, it is unlikely that the area will receive the necessary level of investment from the key high street retailers. This would result in a lack of investment to create the space/new facilities required for major retail development in the area and it would thus be inappropriate for the Catford local plan to be too heavily reliant upon the delivery of new large scale retail development.



Clearly, some new retail space could be sought as part of a mixed use scheme but it will be important for a suitable balance to be struck between retail development and other appropriate town centre uses - and crucially the developments sought must be deliverable in the current market.

Catford town centre will be best served by diversifying from other nearby retail centres by establishing itself also as a service and leisure destination. It already benefits from the provision of a range of cultural and leisure facilities, including the Broadway Theatre. There is an opportunity to diversify Catford town centre so that it has a more distinct role of a service, entertainment and leisure destination than nearby competing centres.

Accordingly, rather than promoting retail uses as a main focus for development, leisure development such as a cinema, gym, restaurants, as well as cultural facilities and improving the night time economy, could be prioritised. These uses are appropriate town centre uses within the NPPF and will complement existing operations and add vitality and vibrancy to the overall town centre.

Due to the limited opportunities for retail development to lead the transformation of Catford town centre, the plan should promote housing and employment uses more heavily and as the starting point for new development within the area, consistent with the aspirations of LBL's Core Strategy that is promoting up to 1,100 new homes in Catford town centre (by 2026) and the London Plan objectives for new jobs and houses in the Opportunity Area.

Indeed, employment uses and residential development are more likely to come forward in this location due to market demand and the sectors' current capabilities. By concentrating jobs and homes in and around the town centre, Catford would benefit from new investment and the new population influx would directly both support the activities of the high street and increase the market that retailers can sell to - leading to further appropriate investment in the retail aspects.

## **Conclusions**

Our client welcomes the fact that LBL is proactively seeking to secure new investment for Catford through the plan making process.

We feel that the investments that you are seeking will lead to much needed positive enhancements to the town centre and will be able to reverse the decline that the centre has recently experienced. We acknowledge that an improving retail offer within Catford town centre would be beneficial but note that this needs to be supported through mixed use opportunities offering leisure uses, employment and housing.

Given the current conditions of the retail market and Catford's position compared with other retail centres in London and in order that real and early change takes place, future redevelopment of Catford town centre should address making the centre a distinctive service, entertainment and leisure destination, with increased employment and housing opportunities.

Deliverability through viable regeneration can be achieved through greater focus on targeting 'early wins' by promoting the development of available open sites. This would allow for more immediate



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improvements that are necessary to improve the vitality of the centre and attract further investment.

We trust our representations will assist the preparation of the Catford Town Centre Local Plan and request that we are kept informed of subsequent iterations. Should you have any queries in the meantime, please contact me or my colleague Lewis Conde.

Yours faithfully

P.P. 

**Dr Malcolm Hockaday FRTPI**  
Chairman